



THE CITY OF NEW YORK
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March 30, 2017

Via ECF

Honorable Judge Peggy Kuo
United States Magistrate Judge
Eastern District of New York
225 Camden Plaza East
Brooklyn, New York 11201

Re: Lamard Joye, Terrell Haskins, and Lateefah Joye v. City of New York, et al.
15- CV-5288 (SJ)(PK)

Your Honor:

I am a Senior Counsel in the Office of Zachary W. Carter, Corporation Counsel of the City of New York, and the attorney assigned to represent defendants City of New York, Police Officer ("Police Officer") PO Montemarano, PO Espinal, PO Saluzzi, and PO Lindie ("defendants") in the above-referenced matter. The undersigned writes the Court on behalf of the parties in accordance with Your Honor's Order of February 21, 2017, to inform the Court that, as indicated in the undersigned's letter at DE 32, the deposition of PO Montemarano began on March 28, 2017. However, the parties were unable to complete his deposition on that date. Plaintiff's counsel wants an immediate date to complete the deposition, within the next week, and defendants are, at the time of this writing, unable to provide one.

To the extent the Court requires further explanation, defendants respectfully request such explanation is provided during an in-person or telephone conference.

Thank you for your consideration herein.

Respectfully submitted,
/s/

Melissa Wachs
Senior Counsel
Special Federal Litigation Division

cc:

Robert Marinelli, Esq. (By ECF)
Attorney for Plaintiff